

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

CHAIM ELIMELECH PURETZ
(a/k/a ELI PURETZ)

Defendant.

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No. 3:24-mc-00079-(RK)

NOTICE OF MOTION TO ADMIT ANDREW D. LINZ *PRO HAC VICE*

PLEASE TAKE NOTICE that, pursuant to Local Civil Rule 101.1, the undersigned hereby moves before the United States District Court of the District of New Jersey for an Order admitting Andrew D. Linz, Esq., of the law firm Cozen O'Connor, to appear *pro hac vice* as counsel for Defendant Chaim Poretz in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the accompanying Declaration of Stephen A. Miller, Declaration of Andrew D. Linz, and proposed Order in support of this motion.

Dated: July 16, 2024

Respectfully submitted,

/s/ Stephen A. Miller

COZEN O'CONNOR

Stephen A. Miller (N.J. 286982018)

1650 Market Street, Suite 2800

Philadelphia, PA 19103

Tel.: (215) 665-2000

Attorney for Defendant Chaim Elimelech Poretz

**IN THE UNITED STATES DISTRICT COURT
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**DECLARATION OF STEPHEN A. MILLER IN SUPPORT OF
PRO HAC VICE APPLICATION FOR ANDREW D. LINZ**

I, Stephen A. Miller, hereby declare as follows:

1. I am an attorney-at-law in the State of New Jersey and a shareholder at the law firm Cozen O'Connor, attorneys for Defendant Chaim Poretz, in connection with the above-captioned matter.

2. I am a member in good standing of the Bar of the State of New Jersey. I am also a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of Illinois. I am admitted to the Bar of this Court.

3. Defendant requests that Andrew D. Linz, Esq., of the firm Cozen O'Connor, appear on his behalf and participate in this action as his attorney *pro hac vice* before the United States District Court for the District of New Jersey.

4. I have entered an appearance for Defendant in this matter, and I certify that I will comply with all provisions of Local Civil Rule 101.1(c).

5. I certify that all notices, orders, and pleadings may be served upon me and that I or another attorney admitted to the Bar of this Court will file papers, enter appearances, sign stipulations, and sign or receive payments on judgments, decrees, or orders. Should the Court

grant Mr. Linz's *pro hac vice* application, I will promptly notify Mr. Linz of their receipt of any such papers.

6. Mr. Linz has been advised of his obligations to comply with the Rules of Professional Conduct adopted by the New Jersey Supreme Court and of New Jersey Local Civil Rule 101.1(c), which governs the admission of counsel *pro hac vice*.

7. The Declaration of Andrew D. Linz in support of her application for admission to the bar of this Court *pro hac vice* has been submitted contemporaneously herewith.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 16, 2024

/s/ Stephen A. Miller
Stephen A. Miller

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FOR THE DISTRICT OF NEW JERSEY**

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v.

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**DECLARATION OF ANDREW D. LINZ
IN SUPPORT OF ADMISSION *PRO HAC VICE***

I, Andrew D. Linz, do hereby declare as follows:

1. I am an associate at the law firm Cozen O'Connor, and practice out of its Philadelphia office located at One Liberty Place, 1650 Market Street, Suite 2800, Philadelphia, PA 19103. I make this certification in support of my application for admission *pro hac vice*.

2. I am admitted to practice before and am in good standing with the bars of the Commonwealth of Pennsylvania (admitted March 12, 2018), the United States District Court for the Eastern District of Pennsylvania (admitted September 4, 2019), the United States Court of Appeals for the Third Circuit (admitted July 8, 2021), and the United States Court of Appeals for the Second Circuit (admitted August 3, 2023). The names and addresses of the offices maintaining the rolls of members of the bars in those jurisdictions are as follows:

Pennsylvania

Chief Clerk
Supreme Court of Pennsylvania
468 City Hall
Philadelphia, PA 19107

**United States District Court for
the Eastern District of Pennsylvania**

Clerk
United States District Court for the
Eastern District of Pennsylvania
James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19103

**United States Court of Appeals for
the Third Circuit**

Clerk's Office
James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19103

**United States Court of Appeals for
the Second Circuit**

Clerk's Office
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

3. I certify that no disciplinary proceedings are pending against me in any jurisdiction and that no discipline has previously been imposed on me in any jurisdiction. I understand that I have a continuing obligation during any period where I am admitted *pro hac vice* to promptly advise the Court of the institution of new disciplinary proceedings.

4. If admitted *pro hac vice*, I shall immediately notify this Court if there is any change in my admission status, residence, or firm affiliation, and I agree to submit myself to this Court's disciplinary jurisdiction for any conduct relating to this matter.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: July 16, 2024



ANDREW D. LINZ

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v.

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[PROPOSED]

ORDER GRANTING ADMISSION *PRO HAC VICE* OF ANDREW D. LINZ

This matter coming before the Court on the application by Stephen A. Miller, Esq. of Cozen O'Connor, on behalf of Defendant Chaim Poretz, for an Order granting the admission, *pro hac vice*, of Andrew D. Linz, Esq. of the firm of Cozen O'Connor, with supporting declarations from Mr. Linz and from Mr. Miller; and the Court having considered the foregoing submissions and for good cause shown, IT IS on this _____ day of _____, 2024

ORDERED that Andrew D. Linz, Esq. shall be and hereby is admitted *pro hac vice* to this Court for this matter; and

IT IS FURTHER ORDERED that Mr. Linz is within the disciplinary jurisdiction of this Court for all actions that may arise out of her participation in this matter; and

IT IS FURTHER ORDERED that Mr. Linz shall notify the court immediately of any change of address, firm affiliation, or any matter affecting her standing at the bar of any other court; and

IT IS FURTHER ORDERED that all pleadings, briefs, and other papers filed with the Court shall be signed by an attorney of record of the bar of this Court, who shall be responsible for the conduct of the case in this Court; and

IT IS FURTHER ORDERED that Mr. Linz shall make payments to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a); and

IT IS FURTHER ORDERED that Mr. Linz shall pay the appropriate *pro hac vice* admission fee to the Clerk of this Court forthwith, if not already paid.

The Honorable Robert Kirsch
United States District Judge

CERTIFICATE OF SERVICE

I, Stephen A. Miller, hereby certify that on this 16th day of July 2024, I caused a true and correct copy of the foregoing Notice of Motion to Admit Andrew D. Linz *Pro Hac Vice*, along with the accompanying Declaration of Stephen A. Miller, Declaration of Andrew D. Linz, and a proposed Order, to be served upon all counsel via the Court's electronic filing system.

/s/ Stephen A. Miller
STEPHEN A. MILLER